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Attorney for Plaintiff
JENNY SHAO

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JENNY SHAO,

Plaintiff,

vs.

URBAN ALCHEMY, *et al.*,

Defendants.

Case No. 3:23-cv-06300-CRB

**STIPULATION FOR DISMISSAL;
~~PROPOSED~~ ORDER**

Fed. R. Civ. P. 41(a)

WHEREAS, on August 7, 2024, Plaintiff JENNY SHAO and Defendants URBAN ALCHEMY, MID-MARKET FOUNDATION AND ROBERT MOORE (the “First Settling Parties”) entered into a written settlement agreement effective August 7, 2024 (the “First Partial Settlement Agreement”);

WHEREAS, on January 21, 2025, Plaintiff JENNY SHAO and Defendants CITY AND COUNTY OF SAN FRANCISCO, ANDREW Q. JUAREZ, and RUBEN A. ROMERO (the “Second Settling Parties”), together with certain payers, entered into a written settlement agreement as to all claims asserted against said Defendants (the “Second Partial Settlement Agreement”);

WHEREAS, the First Settling Parties no longer anticipate filing a Motion for Good Faith Settlement with respect to the First Partial Settlement;

IT IS HEREBY STIPULATED, by and among the First Settling Parties, through their respective counsel, that any condition to settlement requiring a Court determination of the good faith of the settlement be, and hereby is, irrevocably WAIVED;

IT IS FURTHER STIPULATED, by and among the First Settling Parties and the Second Settling

Parties, that the entire Action, including all claims against all Parties, should be dismissed with prejudice, and that each Party to the Action should bear its own attorneys' fees, expert fees, and other costs and expenses;

IT IS FURTHER STIPULATED, by and among the First Settling Parties and the Second Settling Parties, that the Court should enter an Order maintaining jurisdiction to enforce the terms and conditions of the First Partial Settlement Agreement and the Second Partial Settlement Agreement, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure.

Stipulated by Plaintiff JENNY SHAO:

Dated: February 28, 2025

By: /s/ Donald Cloyce Wagda
DONALD CLOYCE WAGDA (Cal. Bar No. 257254)
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Attorney for Plaintiff
JENNY SHAO

Stipulated by Defendant URBAN ALCHEMY:

Dated: February 28, 2025

By: /s/ Kere K. Tickner
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Attorneys for Defendant
URBAN ALCHEMY

1 Stipulated by Defendant MID-MARKET FOUNDATION:

2 Dated: February 28, 2025

3 By: /s/ Jeffrey V. Ta
4 JEFFREY V. TA

5 JEFFREY V. TA, State Bar No. 225188
6 LAGASSE BRANCH BELL + KINKEAD LLP
7 88 Kearny Street, Suite 1850
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12 Dated: March 3, 2025

13 By: /s/ Arnold Levine
14 ARNOLD LEVINE, ESQ., State Bar no. 201792
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21 *Attorneys for Defendant*
22 MID-MARKET FOUNDATION

23 Stipulated by Defendant ROBERT MOORE:

24 Dated: March 3, 2025

25 By: /s/ Jay D. Brown
26 JAY D. BROWN, ESQ., State Bar no. 143522
27 FRIEDENTHAL, HEFFERNAN & BROWN, LLP
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Attorneys for Defendant
ROBERT MOORE

1
2 Stipulated by Defendants CITY AND COUNTY OF SAN FRANCISCO, ANDREW Q JUAREZ
3 AND RUBEN A. ROMERO:

4 Dated: February 28, 2025
5

6 By: /s/ Katherine B. Bearman
7 KATHERINE B. BEARMAN

8 DAVID CHIU, State Bar #189542
9 City Attorney
10 JENNIFER CHOI, State Bar #184058
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23 CITY AND COUNTY OF SAN FRANCISCO
24 ANDREW Q. JUAREZ
25 RUBEN A. ROMERO
26
27
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FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, Donald Wagda, declare under penalty of perjury under the laws of the State of California that each of the other signatories hereto has concurred in the filing of this document.

Dated: February 28, 2025

/s/ Donald Cloyce Wagda

DONALD CLOYCE WAGDA

Attorney for Plaintiff

JENNY SHAO

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. All claims against all Defendants, and this entire Action, are hereby dismissed with prejudice. Each Party to this Action shall bear its own attorneys' fees, expert fees, and other costs and expenses. This Court shall retain jurisdiction to enforce the terms and conditions of the First Partial Settlement Agreement and the Second Partial Settlement Agreement (each as defined in the Stipulation).

Dated: March 4, 2025



HON. CHARLES R. BREYER
United States Senior District Judge